



## THE CITY OF SAN DIEGO

June 15, 2005

John H. Robertus, Executive Officer  
California Regional Water Quality Control Board  
San Diego Region  
9174 Sky Park Court, Suite 100  
San Diego, California 92123

Attn: Tom Alo

Dear Mr. Robertus:

Subject: Response to Tentative Cleanup and Abatement Order R9-2005-0126 for the San Diego Bay Marine Sediments within and Adjacent to National Steel and Shipbuilding Company and South West Marine (PLRP:03-0066.05:alot) (PLRP:03-0137.05:alot)

SAN DIEGO REGIONAL  
WATER QUALITY  
CONTROL BOARD  
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The City of San Diego is pleased to provide the Regional Water Quality Control Board with the following comments and recommendations regarding the Tentative Cleanup and Abatement Order (CAO) for the San Diego Bay Marine Sediments within and adjacent to National Steel and Shipbuilding Company (NASSCO) and South West Marine (SW Marine). We understand the objective of the workshop is to provide information to the Regional Board regarding the appropriate responsible parties and the appropriate level and extent of sediment remediation.

City of San Diego staff has reviewed the tentative CAO and is confused as to how Regional Board staff reached the conclusions contained therein. We understand that the CAO is based on data gathered by Exponent on behalf of NASSCO and Southwest Marine. It is also our understanding that the Exponent study reached dramatically different conclusions regarding the conditions of the Bay. In the absence of a staff report or some other explanation of the basis of the tentative CAO, the City is unable to effectively comment. In addition, the City believes that there are inconsistencies between the conclusions in the tentative CAO and the data presented in other Regional Board technical reports. Accordingly, the City requests that the Regional Board release a staff report or other technical documents explaining how staff using the same data as Exponent, arrived at a substantially different conclusion. Once that data is released, the named parties to the CAO should be given a meaningful opportunity (a minimum of 60 days) to review that report and submit comments to the Board.

One of the more important data gaps is the dearth of information on the remediation levels. We note that the tentative CAO lacks something as simple as a map showing the proposed clean-up area and the levels of contamination in those areas. In addition, the tentative CAO does not



### Metropolitan Wastewater Department

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